	4.1 FACTS II Requirements Summary	4.11 Interfaces
	4.2 Functional Requirements	4.12 System Development
	4.3 Technical Requirements	4.13 System Testing
	4.4 Customer Relations Management Tools	4.14 System Training
	4.5 Project Initiation and Management	4.15 Conversion
	4.6 System Hardware	4.16 System Implementation
	4.7 System Planning and Analysis	4.17 Post Implementation Support
	4.8 Requirements Verification	4.18 Support Federal Review
	4.9 System Design	4.19 Security
	4.10 Reports	

DE_SACWIS-002r_4

4.18 Support Federal Review

RFP reference: 6.18 Support Federal Review, Page 59

The Deloitte Team has deep in experience in working with states to successful complete the federal review. We have helped six states thru the federal assessment process after statewide implementation. Our success is rooted in our approach to integrate federal compliance checkpoints throughout the project life cycle. We do not tack federal review preparation onto the end of an existing project. Federal review preparation steps are embedded throughout our approach, so that when the review happens there are no surprises.

For previously implemented SACWIS projects, securing federal compliance was a task that could be tackled in a reasonably relaxed manner, over a number of years. Reviews occurred, action plans were agreed, enhancements built and the cycle began again.

For the Delaware FACTS II Solution we do not believe that this approach is sufficient. The prevailing environment leads us to believe that navigating the Delaware FACTS II Solution through the federal review process should happen shortly after statewide implementation. For Delaware, we believe that one imperative is the recently revised federal regulations that govern SACWIS funding provide for increased project oversight and establish processes for the reimbursement of federal funding in the event of a failed or stalled SACWIS.

section **HIGHLIGHTS**

- AL FACTS holds the record for shortest time to begin the assessment process
- The Deloitte team brings proven experience in SACWIS and the Federal Review process.
- We believe that preparing for the federal assessment process begins when at project initiation.

Clearly, you have to meet the first requirement and, with ACF signaling that they will be more stringent in their interpretation of the second, the quicker that the Delaware FACTS II Solution achieves federal compliance the better.

Proven Experience in Supporting Federal Reviews of Our SACWIS Solutions

RFP reference: 6.18 Support Federal Review, Page 59

In their proposals, Bidders should describe any previous experience in supporting Federal reviews of their SACWIS solutions. Bidders should also describe their experience in preparing the State's SACWIS Assessment Review Guide (SARG). Additionally, Bidders should define their approach to preparing for the Federal review and how they anticipate supporting the Department during this process

The Deloitte team has vast experience and a **solid approach** in supporting the Federal Reviews of our SACWIS Solutions. The Deloitte team is a leader in helping states thru federal assessment process. We believe that our approach to the design, development and implementation of FACTS II Solution helps make that happen. The figure below illustrates our SACWIS solution history and States that we have supported through the federal assessment process.

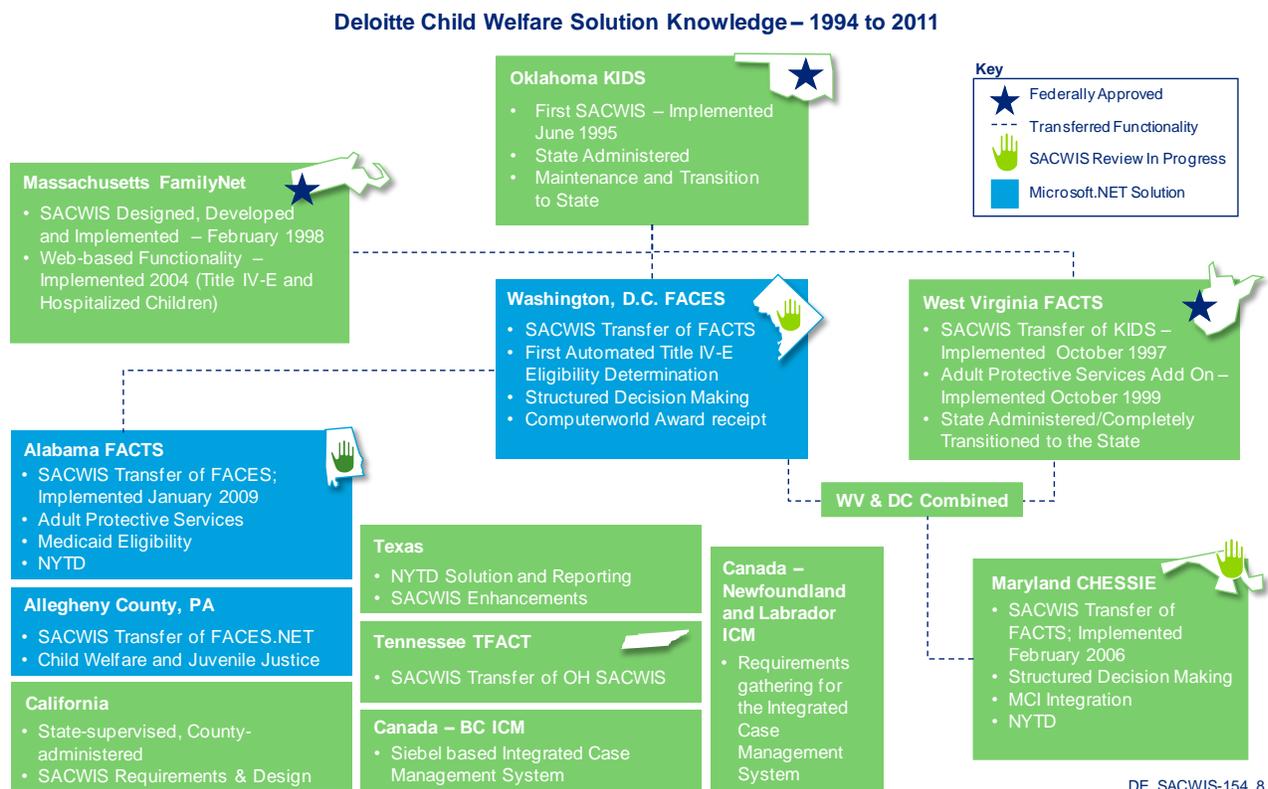
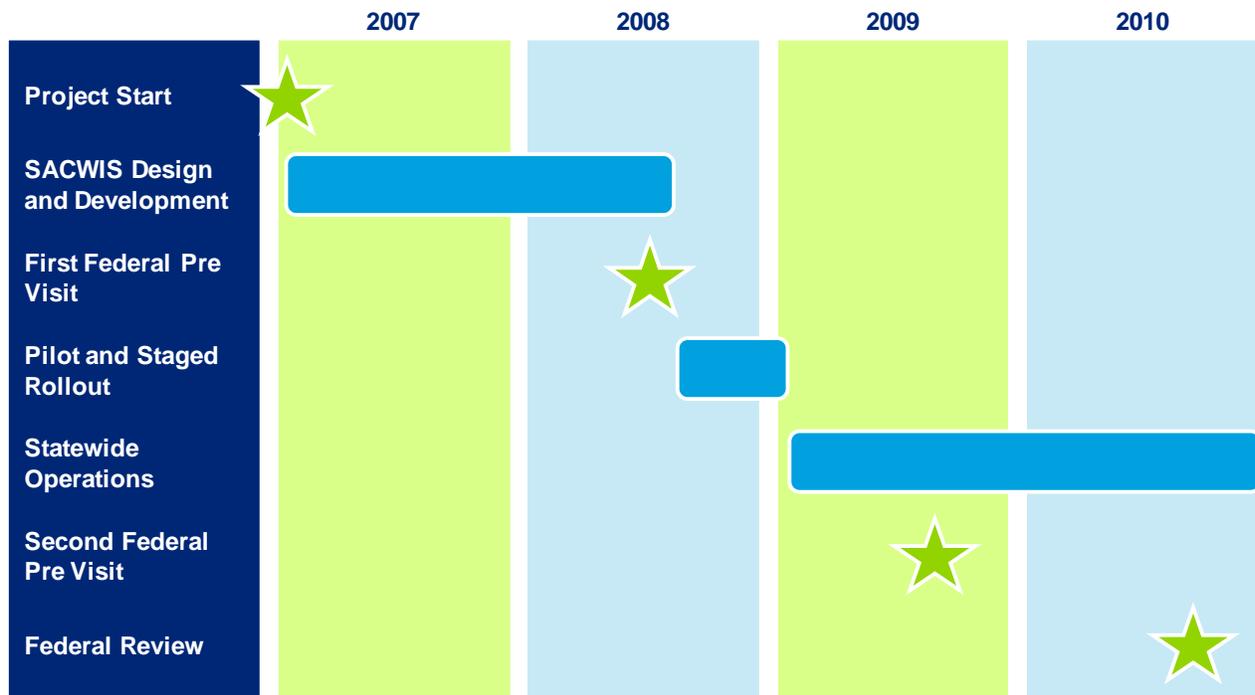


Figure 4.18-1. Federal Approval Performance.

Deloitte knows how to successfully guide a state in completing a Federal Review. On our most recent implementation, Alabama FACTS, the State was able to begin the federal assessment process before pilot. By using our SACWIS compliant DC FACES.NET as the transfer solution, our team integrating SARGe processes/activities at the beginning of the project, and our extensive understanding of the SACWIS requirements and federal expectations set the stage early for the State to begin the assessment. The figure below illustrates how Alabama navigated through the review.



DE_SACWIS-259

Figure 4.18-2. Alabama Federal Review Timeline.

The Deloitte team navigates through the review process faster than anyone.

Alabama was ready for the final federal review to take place 20 months after the SACWIS had finished statewide implementation. We are currently awaiting the results of that review and anticipate them to be very favorable. Assuming that they are, Deloitte will have helped the state move from project initiation to federal approval in less than four years. This is truly record breaking performance.

If the implementation of a successfully assessed federally compliant SACWIS is a criterion for success then there is no better partner, than the Deloitte team to work with you to help Delaware achieve federal compliance of your SACWIS.

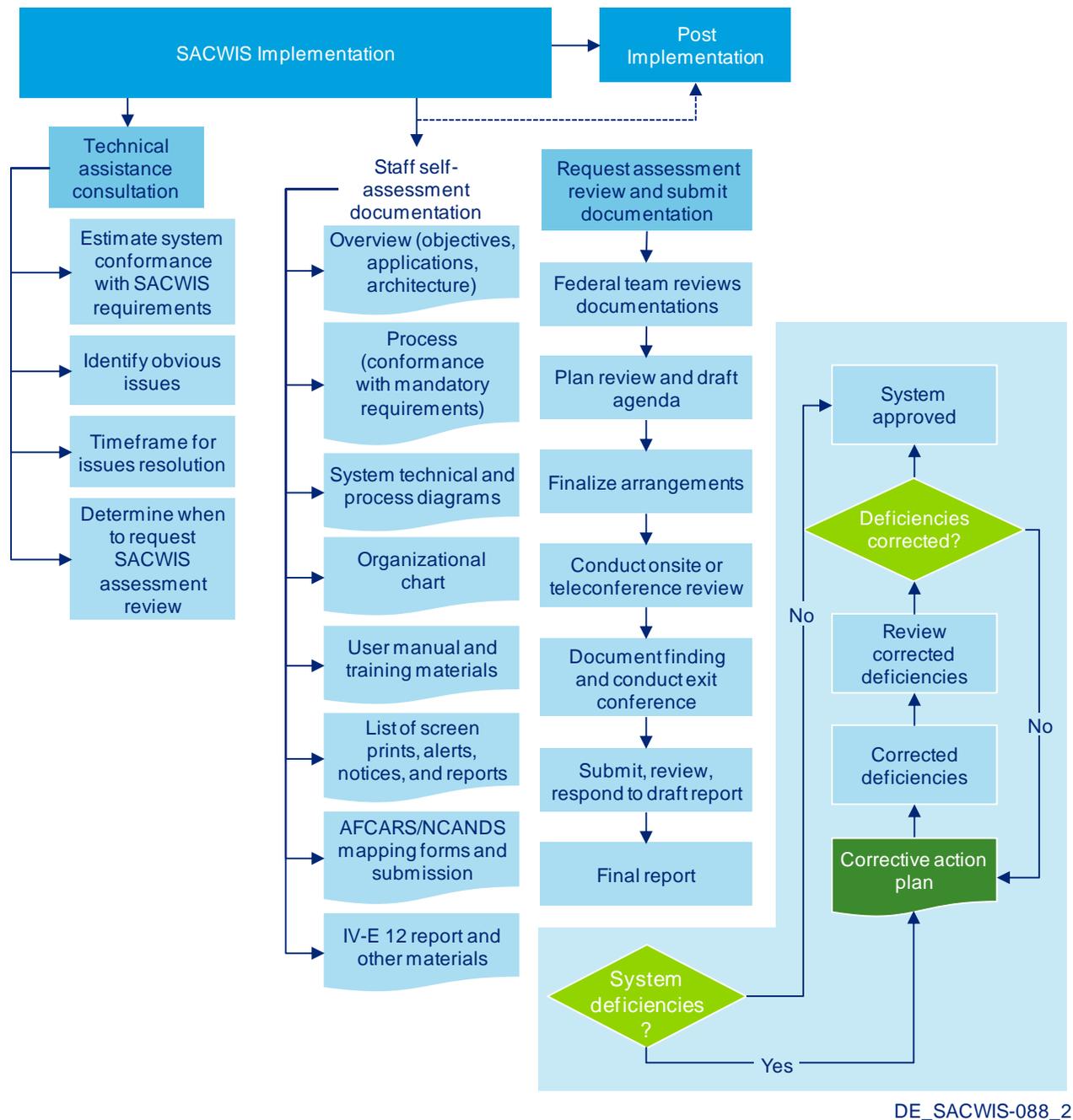
Features	Benefits
Experienced in navigating the federal process	<ul style="list-style-type: none"> • We know what ACF is looking for and how to present it • We understand where states typically trip up – and know how to avoid those pitfalls
Federal compliance reviews built into our methodology	<ul style="list-style-type: none"> • The solution we bring is already compliant • Any Delaware changes we make are reviewed at the point of design to check for any potential compliance issues before the changes are built
Former ACF staffers on our team	<ul style="list-style-type: none"> • An ongoing and fruitful relationship with ACF, allowing difficulties to be resolved informally and escalations avoided • A constantly up to date understanding of the way in which the federal reviewers are defining best practices.

Table 4.18-1. Features and Benefits of Our Federal Review Solution.

Proven Experience in Preparing State’s SACWIS Assessment Review Guide (SARG)

We understand the importance of maintaining an up to date SARGe document that facilitates the federal review process once it begins after implementation. Deloitte can contribute to the process on a much more foundational level. We have a vested interest in seeing the Delaware FACTS II Solution achieve federal compliancy so that we can retain our track record of success.

To understand where we can apply our value added activities, it is worth illustrating the federal review process. This is shown in the following figure.



DE_SACWIS-088_2

Figure 4.18-3. Federal SACWIS Review Process.

The Deloitte team’s extensive knowledge of the process supports the State’s SACWIS assessment review.

In its *SACWIS Assessment Review Guide*, the Administration for Children and Families, Children’s Bureau, Division of State Systems indicates that it will make “every effort ... to conduct a technical assistance consultation with the State ... during or immediately after pilot implementation.” The purpose of this technical assistance consultation is to make a rough determination regarding the system’s compliance with SACWIS requirements, identify obvious problems and develop a plan for resolving them, and to determine when

the State should make a formal request for an Assessment Review. Once the system has been designed, tested, and implemented at least on a pilot basis, the formal process for seeking federal approval can begin.

Deloitte offers its support through this technical consultation. The updated SARGe forms the basis of the consultation process; however our experience suggests that most of the project deliverables produced to date will be touched, plus a complete demonstration of the piloted system. Having a partner on hand who understands the process and how best to respond to federal inquiries is invaluable.

The federal review process cannot begin until in excess of 30 percent of foster and adoptive cases are converted and managed in the new Delaware FACTS II Solution. After that, we assist you in completion of the self assessment component of the SARGe and the review process begins.

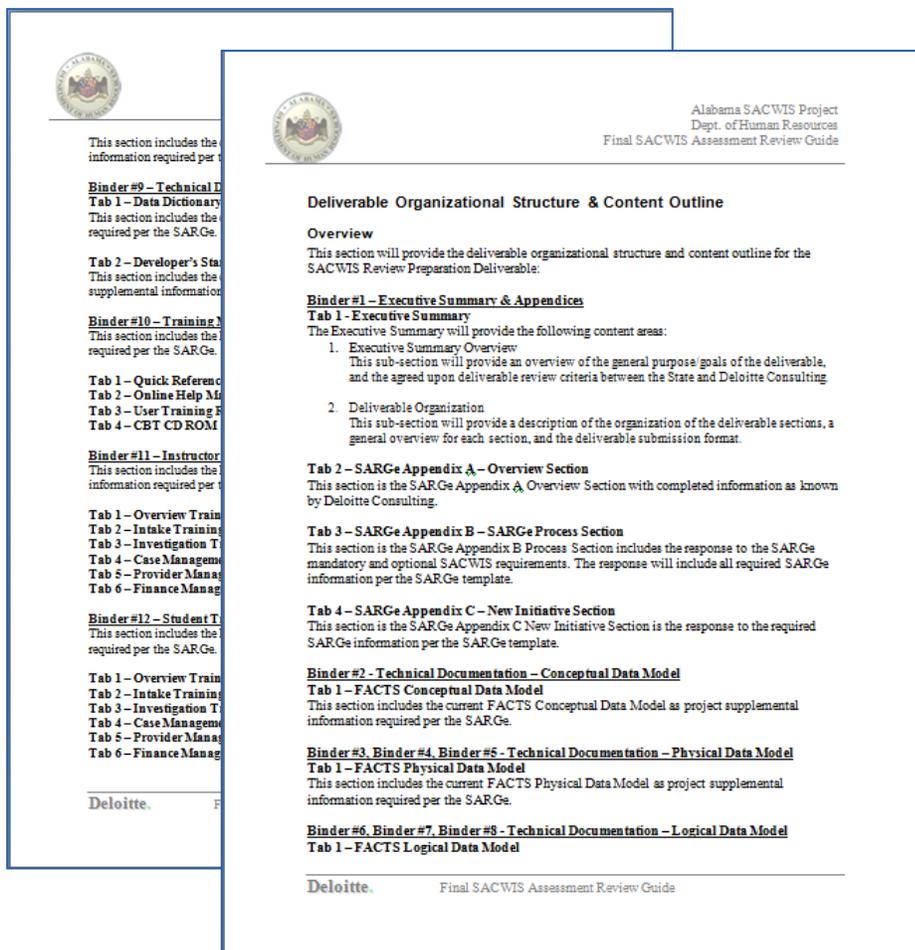
Our approach to support the federal review process is based on the recognition that preparing the SARGe is a natural extension of the normal system development life cycle. Throughout the project period, we verify that:

- All mandatory federal functionality requirements are met in design and development
- All optional requirements and additional state requirements specified in the APD are met in design and development
- All necessary materials are carefully prepared to document and demonstrate that federal requirements are met or exceeded
- Our process begins with a thorough review of your existing federal submissions

At the start of the project, we perform a thorough review of the Advance Planning Document (APD) that was submitted by the State and approved by ACF and their federal partners. Since there are not any specific federal SACWIS certification criteria, it is the approved APD that forms the contract between the State and ACF which defines what the Delaware FACTS II Solution will do.

Our maintenance of the SARGe throughout the project life cycle rests upon a definitive understanding of what functionality ACF is anticipating will be delivered as a result of the approved APD and documented in the SARGe.

The following graphic details the table of contents for the SACWIS Assessment Review Guide deliverable submitted for our Alabama FACTS project. Deloitte understands that the Federal Review Readiness Plan is the deliverable you require, this graphic is submitted only as a representation of what we have previously done.



DE_SACWIS-1510

Figure 4.18-4. Sample Federal SACWIS Review Deliverable.

Periodic SARGe Compliance Review

The earlier that any possible deviation from the approved APD is spotted, the easier it is to remedy. At key points in the project, we conduct a crosswalk from project deliverables to the SARGe in order to see that the SARGe requirements are fully covered by the deliverable. This review occurs at the following points within the project:

- Creation of an approved set of requirements
- Creation of an approved detail design
- Completion of system testing
- Completion of user acceptance testing
- Completion of statewide implementation

At the point of the requirements crosswalk, we flag all approved SACWIS requirements that are essential in meeting the SARGe requirements. As the project progresses, our standard requirement traceability mechanisms are used to continuously track the status of

SARGe related requirements as they are translated into detailed designs and ultimately code.

In this way, we enact traceability between the SARGe and the finished Delaware FACTS II Solution.

The SARGe traceability that we provide also supports you in preparing your Annual APD Update document (APDU) to ACF which outlines the status and progress of the project.

Preparation, Review, and Revision of SARGe

Federal reviews are not conducted upon the basis of the SARGe appendices alone. In addition, the State must submit all system documentation, data models, training materials and other project artifacts. As federal review visits are conducted during the project period, the Deloitte team assists the State in preparing and presenting this requested information regarding the functionality of the system and the development process in a manner best placed to secure approval.

There is considerable leeway in terms of the timing of the Assessment Review request. At the earliest, 30 percent (30%) of the State's foster care and adoption caseload must have been converted to and maintained under the functional system, and at least one county or local district office must be operational. At the latest, the Assessment Review must be initiated within six months after the system has been completed. Initiation within six months after the system has been completed does not require the federal on-site review to occur at this point, but a request for the assessment should be submitted to ACF for consideration by this date. Over the past three years, ACF has frequently requested the on-site assessment not occur until after a year of operation across the State and during a time frame when contracted resources remain available to support necessary maintenance and operations. While ACF understands the importance placed on the Assessment Review, there has also been a strong bias to eliminate dependencies within the scope of the SACWIS Development, Delivery and Implementation request for proposal on a federally initiated audit of SACWIS compliance. Some States have then chosen to implement their own review process following the guidelines available in the SACWIS Assessment Review Guide.

The first step in the review process is for the State to complete a self-assessment, using a standard questionnaire that is included in the SACWIS Assessment Review Guide (SARGe). This questionnaire forms the basis for all federal documentation resulting from the review. It includes two sections, an Overview section and a Process section.

The Overview section is a general description of the system's objectives, applications, and architecture to assist other states and ACF in understanding the size, cost, and functionality of the system. It includes the following areas:

- General Information
- Technical Information
- Contractor Information

- Financial Information
- Confidentiality Information
- Lessons Learned
- Supporting Documentation
- System Diagrams (both technical and process)
- Organizational Chart
- Current User Manual
- Training Manual and Materials
- Data Element Dictionary
- Numbered List of System Screen Prints
- Numbered List of System Alerts/Ticklers
- Numbered List of System Notices
- Number List of Reports, including Management and Financial
- AFCARS Mapping Forms
- A Test or Actual AFCARS Submission
- NCANDS DCDC Mapping Forms and Schedule for Submitting Data
- SACWIS Reports Used to Complete the Federal IV-E 12 Report
- Other Cross-Reference Material

The Process section of the self-assessment documents the functionality of the system in detail and describes the system's conformance with the mandatory federal requirements and the optional requirements that become mandatory as a result of being included in the approved APD.

The Deloitte team has developed federally compliant approaches for all of the following functional areas for SACWIS solutions. For each of the functional areas listed in the table below, the questionnaire documents the relevant cross-reference material, screen identifiers, alert identifiers, notice identifiers, and report identifiers:

SARGe Functional Areas	
Intake	Court Documents
Screening	Notifications
Investigation	Tracking
Assessment	Indian Child Welfare Act
Initial Eligibility Determination	Accounts Payable
Changes in Eligibility	Accounts Receivable
Service/Case Plan	Claims
Case Review/Evaluation	Staff Management
Monitoring Service/Case Plan Services	Reporting
Facilities Support	Administrative Support
Foster/Adoptive Homes Support	Required Interfaces
Resource Directory	Optional Interfaces
Contract Support	Quality Assurance

Table 4.18-2. Functional Areas included in Federal SACWIS Review.

The following is an example of this completed SARGe process section cross reference documentation that we have previously produced to support a federal review.

B. I: Intake Management

Goal: Through the effective and efficient use of automation, provide for the administration of the processes necessary to ensure that the child welfare services (CWS) agency can respond to those who need assistance through the proper identification of the individuals and provision of appropriate assessment procedures.

A: Intake

Goal: To provide an automated entry point into the child welfare services (CWS) agency for children and families who seek services, are referred for services, and/or who are reported to the agency.

Cross Reference Box for the INTAKE Section			
Reference Sources (Document/Chapter): FACTS Instructor Guide Intake- Chapter 2, 3 FACTS User Manual Intake - Chapter 2, 3			
Screen Identifier	Alert Identifier	Notice Identifier	Report Identifier
RF009, RF010, RF011, RF012, RF013, RF014, CM022, CM020, CF020, CF031	IN006 (After 30 days from the date of Intake an alert is sent to the worker stating that the intake is in pending status for 30 days), IN007 (Upon request for approval an alert is sent to the supervisor	IIS-TP-2121- AEIS – DHR CAPTA REFERRAL FORM 2121, IIS-CL-0210- ALLEGATION TO OUT-OF-HOME PARAN 0210,	IIS-SF-IntakeSnapshot-INTAKE SNAPSHOT REPORT

DE_SACWIS-089

Figure 4.18-4. Example of Completed SARGe Cross Reference Guide.

The Deloitte team has extensive prior experience of producing SARGe documentation to support federal review.

We fully understand all of the documentation requirements to support the process and have prepared them on multiple occasions. We bring an insider’s insight into the review process and know how to present information in a manner that facilitates a smooth review.

Supporting the Department through the Federal Review Process

For the duration of the contract, our team stands ready to support your team by participating in federal reviews as required. We understand the process – the following table is extracted from the federal guidance on how reviews are to be administered.

Phase	Description
1	Once the self assessment is complete, the State requests a formal Federal Assessment Review of the system. This request includes submitting an electronic copy of the self assessment, which forms the basis for subsequent federal documentation. This step is the first of four phases in the review process, Review Initiation. This phase also includes the federal response to the request including identifying the federal review team and scheduling the review, which may take place either on-site or by teleconference, depending upon the availability of federal resources.
2	The second phase includes the review of the State’s documentation by the federal team, preparing an agenda for the review including a work plan and schedule, and finalizing the arrangements with the State, including local agency personnel involved in the review, which includes review of two to four local agencies of varying sizes.
3	The third phase is the four- or five-day on-site (or telephone) review, which includes a system demo and entrance conference, local office visits and interviews, daily documentation of the federal review findings using the State’s questionnaire, preparation of the finding summary worksheet if significant deficiencies are identified, and conducting an exit conference to present the specific findings from the review process and preliminary recommendations.
4	The fourth and final phase involves the preparation of the final findings and conclusions, which are then presented within 60 days of the end of the review to the State in draft form for review and comment. The State has 30 days to review and comment on the draft report, which is issued in final form within 30 days after receiving State comments.

Table 4.18-3. Review Phases.

We know what makes for a good review process. Organizing the logistics to facilitate a smooth review includes careful consideration of:

- Counties and offices to be visited
- Individual workers to be interviewed
- Supervisors and managerial staff to be interviewed
- Sample cases to be used in demonstrations, including an understanding of CFSR findings and Title IV-E findings in case these are requested to be used as examples
- An understanding of an legislative change or policy guidance that was issued after the approved APD or which are not included in the SARGe (for example, NYTD functionality) which may have an impact upon review findings
- How daily debriefs will be conducted

A successful review is not merely something that happens by chance. Our experience in organizing the process will pay significant dividends in smoothing your way through it.

Roles, Responsibilities and Acceptance

We recognize that the timely implementation of the Delaware FACTS II Solution system relies on coordinated efforts between Deloitte, DHS, and DTMB. We understand and agree to comply with the roles and responsibilities in the table below:

Federal Review	State Role	The Deloitte Team’s Role	Acceptance Criteria
SACWIS Assessment Review Guide (SARGe)	<ul style="list-style-type: none"> • Provide supporting materials from the IAPD, APD, and previous related activities • Review and approve updated SARGe Assessment Review Guide 	<ul style="list-style-type: none"> • Prepare SACWIS Assessment Review Guide (SARGe) • Obtain DSCYF comments on draft review and monitoring deliverables • Prepare and submit deliverables for approval 	<ul style="list-style-type: none"> • Documentation of the Updated SARGe Assessment Review Guide as described in this RFP
SACWIS Assessment Review (SAR) Initiation	<ul style="list-style-type: none"> • Prepare and submit request to initiate ACF for Review and Monitoring 	<ul style="list-style-type: none"> • Assemble and confirm complete list of materials to be submitted as part of the SAR Documentation Submission 	<ul style="list-style-type: none"> • List of materials is complete and materials assembled
SAR Documentation Submission to HHS	<ul style="list-style-type: none"> • Prepare and submit SAR Documentation to ACF 	<ul style="list-style-type: none"> • Assemble approved documents and supporting materials for a federal review and monitoring package 	<ul style="list-style-type: none"> • Package contains approved documents and supporting materials

Table 4.18-4. Roles and Responsibilities for Federal Review.

Deloitte understands the importance of the federal review process in maintaining federal funding for the Delaware FACTS II Solution. With the new regulations, the fiscal implications for failure have become more significant. It is in the best interests of all parties involved to confirm that the system complies with federal requirements all the way through the system life cycle.

The Deloitte team has the proven SACWIS experience and federal knowledge to help DSCYF readiness to begin the process as early as you are comfortable, to progress through the process, and to ultimately complete the assessment process.

The Deloitte team has gone through several successful Federal assessment phases with each state SACWIS system it has help implement. Having a partner on hand who understands the process and how best to respond to federal inquiries is invaluable. At key points in the project, we conduct a crosswalk from project deliverables to the Federal assessment process in order to see that the review process requirements are fully covered by our approach.

Deloitte uses their previous experience in assisting with the creation of a Federal Review Readiness Plan. Deloitte has lessons learned from each Federal review that determine a drive for perfection in Delaware's Federal review going forward. This Readiness Plan contains the detailed approach selected by Delaware and Deloitte along with associated deliverables to help with the process.

4.18.1 Associated Deliverables

RFP reference: 6.18.1 Associated Deliverables, Page 57

The following deliverables are required during the Support Federal Review Phase:

- Federal Review Readiness Plan
-
- Federal Review Readiness Plan

